



U.S. Department of Justice

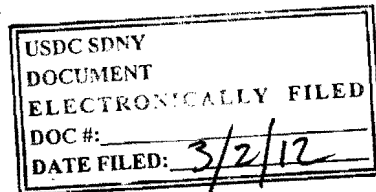
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March 1, 2012

VIA FACSIMILE (212) 805-7991

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007



Re: United States v. Mikhail Zemlyansky, et al.
12 Cr. 171 (JPO)

Dear Judge Oetken:

The parties write to request a modification of the bail conditions set for Michael Barukhin, a defendant in the above-referenced matter.

On February 29, 2012, Barukhin was presented and arraigned on the Indictment, which charged him with conspiracies to commit racketeering, health care fraud, mail fraud, and money laundering, in violation of 18 United States Code Sections 1962(d), 1349, and 1956(h). Bail was set as follows: a \$2 million personal recognizance bond, secured by \$50,000 in cash and co-signed by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; the defendant was to surrender his passport and make no new applications; regular pretrial supervision; and a prohibition against opening new financial and credit accounts without approval from the Pretrial Services Office and any business dealings with medical clinics. At this time, with the consent of defense, the Government requests that the bail conditions be modified to include a third co-signer by March 7, 2012, as further security for the bond of \$2 million.

Respectfully submitted,

APPLICATION GRANTED:

By: HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE
3/2/12

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